

P.O. BOX 7328 - GARDEN CITY, GEORGIA 31418-7328 - TELEPHONE 912-966-2159 February 26, 2009

IA ELECTRONIC FILING

darlene H. Dortch, Office of the Secretary dederal Communications Commission 5 12th Street, SW dite TW-A325 shington, D.C. 20554

Re: Annual 47 C.F.R. § 64.2009(c) CPNI Certification for 2008

EB Docket No. 06-36

Advanced Communications & Electronics, Inc.

499 Filer ID: 812345

I, Donald L. Bigbie, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established experiting procedures effective during the calendar year 2008 that are adequate to ensure compliance the Customer Proprietary Network Information ("CPNI") rules set forth in 47 C.F.R. §§ 64 2001-2011 of the rules of the Federal Communications Commission ("Commission").

Attached to this certification is an accompanying statement which (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.J.R. §§ 64.2001 et seq. of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the company regarding tactics preferences may be using to attempt access to CPNI, and (iv) summarizes any customer complaints pecelved in the past year concerning the unauthorized release of CPNI.

Name: Donald L. Bigbie Title: Vice President

Date: 2 - 2 > 0 \(\frac{1}{2} \)



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Advanced Communications & Electronics, Inc. PNI Certification

Her ID No. 812345

STATEMENT

Advanced Communications & Electronics, Inc. ("Carrier") has established operating cedures that ensure compliance with the Federal Communication Commission ("Commission") gulations regarding the protection of customer proprietary network information ("CPNI").

Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.

Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.

Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.

Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

disclosure of CPNI in accordance with FCC timelines.

carrier took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: **None**



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- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect
- CPNI: <u>Carrier has determined that no pretexter has attempted to access CPNI on</u> Carrier's system.

The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:

- o Number of customer complaints Carrier received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **None**
- Category of complaint:
 - <u>0</u> Number of instances of improper access by employees
 - <u>0</u> Number of instances of improper disclosure to individuals not authorized to receive the information
 - <u>0</u> Number of instances of improper access to online information by individuals not authorized to view the information
 - <u>0</u> Number of other instances of improper access or disclosure
- Description of instances of improper access or disclosure: None